IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

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)
) C.A. No. 1:11-cv-04791) Honorable Robert M. Dow, Jr.
) Honorable Robert M. Dow, Jr.
))

UNITED STATES' UNOPPOSED MOTION TO ENTER CONSENT DECREE

The United States hereby moves that the Court approve, sign and enter the Consent Decree that was lodged with this Court on August 27, 2013 (Dkt. # 46 & 46-1)(for the Court's convenience, a copy of the proposed consent decree, as lodged, is attached to this Motion). If entered, the Consent Decree would resolve claims of the United States in the above action against the Defendants who have contributed toward reimbursing the United States for the costs it incurred in performing a removal action at the U.S. Scrap Site, located in Chicago. The Plaintiff and all Defendants support entry of the Consent Decree.

For the reasons set forth in the accompanying Memorandum in Support of Unopposed Motion to Enter Consent Decree the Court should approve, sign, and enter as a court order the attached proposed Consent Decree. A space for the Court's signature appears on page 12 of the

proposed Consent Decree.

Respectfully submitted,

FOR THE UNITED STATES OF AMERICA

ROBERT G. DREHER

Acting Assistant Attorney General Environment and Natural Resources Division United States Department of Justice

/s Lisa A. Cherup_

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I hereby certify that on October 29, 2013, a copy of the foregoing Motion for Entry of

Proposed Consent Decree was filed electronically. Notice of this filing will be sent to the parties

by operation of the Court's electronic filing system. Parties may access this filing through the

Court's system.

s/ Lisa A. Cherup____

Lisa A. Cherup

Trial Attorney

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